

**Kristi Cahoon Kelly**

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**From:** Leonard Bennett [lenbennett@clalegal.com]  
**Sent:** Tuesday, August 14, 2012 5:45 PM  
**To:** Ramana, Anand V.  
**Cc:** Kristi Cahoon Kelly; lenbennett@cox.net; Andrew Guzzo; Susan Rotkis; Pumphrey, Brian E.  
**Subject:** Re: Rocabruna v. Bank of America: SUBJECT TO SETTLEMENT PRIVILEGE PROTECTION

If you want to make an offer do so In the meantime We will be busy on your ridiculous discovery requests.

Separately, we will be taking the 30b1 deps of BOAs ACDV operators in early September. Please provide dates between August 24 and Sept 7. Should be a routine dep defense for anyone with FCRA litigation experience.

Personal regards as always,  
Len

Sent from my iPhone

On Aug 14, 2012, at 3:26 PM, "Ramana, Anand V." <[ARamana@mcguirewoods.com](mailto:ARamana@mcguirewoods.com)> wrote:

Counsel,

Please see the enclosed correspondence and written discovery requests. It may make sense for us to have a short call regarding settlement this week. If you agree, please let us know and I'll schedule a call.

Thanks,

Anand V. Ramana  
McGuireWoods LLP  
2001 K Street, NW  
Washington, DC 20006  
202.857.1734 (Direct Line)  
202.828.2973 (Direct Facsimile)  
[aramana@mcguirewoods.com](mailto:aramana@mcguirewoods.com)

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